



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I  
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BOSTON, MASSACHUSETTS 02109-3912

JAN 26 2018

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

Daniel F. O'Neill, P.E.  
Executive Director  
Lynn Water and Sewer Commission  
400 Parkland Avenue  
Lynn, MA 01905-1138

Re: 2017 CMOM Corrective Action Plan No. 76-cv-02184-RGS

Dear Mr. O'Neill:

On June 1, 2017, EPA sent the Lynn Water & Sewer Commission (LWSC or the Commission) a letter containing EPA's comments on the Commission's CMOM Self-Assessment Report dated March 31, 2017. EPA requested these comments be addressed in the CMOM Corrective Action Plan (CAP) which the Commission submitted on June 30, 2017. EPA has reviewed the CMOM CAP and has the following comments: (bold items were comments EPA provided in the June 1, 2017 letter)

- 1) The modified CAP must provide that a complete inventory of all collection system assets be completed by July 1, 2018.**

Paragraph 21.a. of the Third Modified Consent Decree ("TMCD") requires LWSC to complete and submit a detailed inventory of the Commission's collection system. The CMOM CAP says that it is the goal of LWSC to complete the inventory of the collection system assets by July 1, 2018. Provide EPA and MassDEP with an update on this by February 28, 2018, including information on what steps have been taken to complete the inventory.

- 2) The modified CAP must provide a detailed description of the status of CMMS procurement, and steps being taken to complete procurement of the necessary hardware and software and implementation of the CMMS by December 31, 2017.**

Under Paragraphs 21 and 22 of the TMCD, LWSC is to have implemented a Management Information System ("MIS") that includes a computerized maintenance management system ("CMMS"), a geographic information system ("GIS"), and mapping. The CMOM CAP states that "VUE Works" software has been approved by the Board of Commissioners and purchase should be finalized by mid-July, 2017. Implementation of the VUE Works software is scheduled for completion by December 31, 2017.

Provide EPA and MassDEP with an update on this by February 28, 2018, including whether

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the "VUE Works" software has been purchased and whether implementation of the Vue Works software has been completed.

- 3) **The modified CAP update must provide a schedule for development and submission to EPA and MassDEP of detailed SOPs for sewer, force main and siphon cleaning and inspection, catch basin cleaning and manhole inspection. The SOPs must insure that the CMMS will support the necessary work order procedures and fully capture work done on the collection system.**

The CMOM CAP did not address this comment. The CMOM Self-Assessment Report stated that LWSC does not have written SOPs for sewer line, manhole, force main, siphon and catch basin inspection and cleaning, and recommended writing such SOPs.

Provide EPA and MassDEP a schedule for the development of the SOPs outlined above by February 28, 2018.

- 4) **The modified CAP must require that the CMOM Annual Report submitted in January 2018, and all subsequent CMOM Annual Reports, include a detailed summary of the inspections done during the previous year (e.g., number of catch basins and manholes, length of sewer pipe, etc.) and a description of cleaning and other maintenance (e.g., number manholes repaired or replaced, length of sewer pipe repaired or replaced, quantity of sediment removed from sewer pipes and catch basins) done as a result of the inspections. The CMOM Annual Report shall state whether the amount of routine inspection and cleaning being done, for each type of component, is in accordance with the frequencies specified in the LTPMP. The CMOM Annual Report submitted in January 2018 shall also include a detailed summary of the inspections and cleaning done in 2014-2016.**

As a reminder, EPA is expecting to see the information that is outlined above in the CMOM Annual Report.

- 5) **The modified CAP must provide for development and submission by December 31, 2017 to EPA and MassDEP of a FOG Control Program. As part of the Program, the Commission shall describe in detail how it will coordinate with ISD to address sources of excessive FOG. The Program must include a proposed implementation schedule, including a schedule for the update of the IPP.**

Under Paragraph 20 of the TMCD, LWSC is required to complete and submit a FOG program document. The CMOM CAP states that a FOG program document will be developed by December 31, 2017.

Provide a copy of the FOG program document to EPA and MassDEP by February 28, 2018, including a description of how LWSC will coordinate with ISD and a proposed implementation schedule.

- 6) **Appendix A of the 2017 self-Assessment (in the second checklist at page 21), states that there are 20-30 chronic SSO locations in the collection system. The modified**

**CAP should include a list identifying the locations of these chronic SSOs and describe the Commission's plans to address them.**

EPA did not see anything that addressed this concern in the CMOM CAP. Please provide this information to EPA and MassDEP by February 28, 2018.

- 7) In September 2013 the LWSC submitted a CMOM CAP, Section 4.3.4 stated that the commission will develop a formal training program. In March 2017 the LWSC submitted the CMOM Self-Assessment Report. Section 3.3.3 discussed developing formal training programs with sign in sheets for the training sessions. In June 2017 the LWSC submitted another CMOM CAP which included Section 4.3.4 "Training for LWSC Staff" that outlined several areas to be covered for SSO training.

Provide the following to EPA and MassDEP by February 28, 2018: Describe when LWSC began this training program. Describe what material is covered in the training program. Provide the number of LWSC employees who have been trained under this program and provide copies of sign in sheets from the trainings.

- 8) Section 4.1 of the 2017 CMOM CAP states that "Local notification of impacted residents is also necessary to protect public health, and is part of an effective SSO response program." The SSO SOP found in the Emergency Response Plan requires a crew to notify the appropriate persons on the SSO Notification contact list. As written, contact can only be made via email, as there are no phone numbers listed. At a minimum the main phone numbers to the DPW and the Board of Health should be included on the contact list.

Previously EPA provided the Commission with some examples of real time notification options such as the Commission's website and reverse 911 calls. The Commission could also coordinate with the City of Lynn's Office of Emergency Management. Provide how local notification of the public will be achieved as stated in Section 4.1 of your CMOM CAP and provide a revised SSO Notification Contact list by February 28, 2018.

- 9) EPA reiterates its comment that the SSO Emergency Response Plan shall include notification to EPA and MassDEP of street flooding events in areas served by combined sewers, or to which discharges from separate sanitary sewers are a contributing factor.

A list of these street flooding events including location, the City or Commission's response, and causes, shall be included in the Annual CMOM Report.

- 10) The Incident Report form, which was included as part of the Emergency Response Plan should have a location on the form to estimate the volume discharged (in gallons), or if surcharging (in gallons per hour), from an SSO location and where the SSO discharge goes to, similar to the MassDEP SSO reporting form.

Provide an updated form to EPA and MassDEP by February 28, 2018.

11) Add to the Street Flooding SOP a line item to notify EPA and MassDEP along with a copy of the incident report form.

Provide an updated form to EPA and MassDEP by February 28, 2018.

Should you have any questions regarding these comments, please contact Douglas Koopman of my staff at 617-918-1747.

Sincerely,



Denny Dart, Manager  
Water Technical Unit

cc: Via Email  
Douglas Koopman, EPA Water Technical Unit  
Kevin Brander, Section Chief, Wastewater Management Section, DEP/NERO  
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